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April 24, 2025

Via ECF

Magistrate Judge Robert M. Levy
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Twin Beauty LLC v. NR Interactive LLC, and Nir Rodriguez.*
Eastern District Court of New York - Case No. 1:24-cv-07412-RPK-RML

Dear Honorable Magistrate Judge Levy:

Our firm represents Plaintiff Twin Beauty LLC (“Plaintiff”) in the above-referenced action.

We write this letter pursuant to Fed. R. Civ. P. 16(a) and in furtherance of the Court’s interest in expediting the disposition of actions, to respectfully request the Court to hold a pretrial conference in this proceeding at Your Honor’s earliest convenience.

The relevant procedural history thus far is outlined below:

Plaintiff commenced the instant proceeding by filing the complaint (ECF No. 1) (“Complaint”) on October 23, 2024. Plaintiff amended the Complaint on January 13, 2025 (ECF 33) (“FAC”) after Judge Kovner denied Plaintiff’s motion seeking a preliminary injunction, partly based on questions of personal jurisdiction over Defendant Nir Rodriguez (“Defendant Rodriguez”) in particular. *See, ECF No. 27.* Defendant Rodriguez moved to dismiss the FAC on January 22, 2025. *See, ECF No. 35.* The Clerk issued a certificate of default against Defendant NR Interactive LLC (“Defendant NRI”) on February 10, 2025. Accordingly, Plaintiff moved for default judgment against Defendant NRI on February 28, 2025 which has gone unopposed. *See, ECF No. 42.* Defendant Rodriguez’s motion to dismiss, having been fully briefed, is pending a decision by Judge Kovner.

We appreciate the Court’s attention to this matter and are available at the Court’s convenience should further clarification be necessary.

Respectfully,

/s/ Andrea T. Timpone
Andrea T. Timpone